

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No.: 21-CR-108 (2) (PAM/TNL)

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UNITED STATES OF AMERICA, )  
 )  
 Plaintiff, )  
 vs. ) **MOTION FOR DELAYED REPORT  
 DATE & REQUEST FOR IN-STATE  
 PLACEMENT**  
 TOU THAO, )  
 )  
 Defendant. )  
 )

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Mr. Tou Thao (“Mr. Thao” hereinafter) respectfully moves the Court for an order allowing him to self-report at a later date should this Court sentence him to a term of imprisonment.

Mr. Thao respectfully asks this Court that should he be sentenced to a term of imprisonment, he be allowed to self-report on a date sometime between Christmas and New Years Day (December 26, 2022, through January 1, 2023). The State prosecution team is still moving forward with their case against Mr. Thao for the same actions underlying this case. The State trial has been scheduled to begin *voir dire* on October 24, 2022, and opening statements beginning on November 7, 2022. In an Order dated June 22, 2022, it was ordered that the State trial be finished and deliberations begin no later than December 16, 2022.

Mr. Thao respectfully moves this Court to allow him to remain out-of-custody in this matter for the duration of the related State trial so that he can easily meet with his attorneys and aid in his own defense. Knowing that deliberations will begin no later than December 16, 2022, Mr. Thao believes a report date between Christmas and New Year will allow sufficient time for a verdict to be returned.

Additionally, Mr. Thao respectfully asks that if he be sentenced to a term of imprisonment, this Court make a recommendation for him to be placed in the facility in Minnesota, including but not limited to the FPC Duluth facility.

Respectfully submitted,

Dated: This 26<sup>th</sup> day of July, 2022

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